ATTACHMENT B

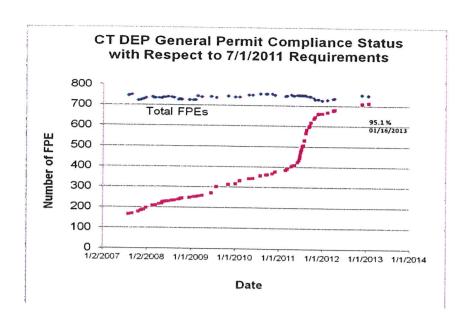
GNHWPCA FOG Reduction Maintenance Program

As noted in the EPA letter, Fats, Oils and Grease (FOG) is a root cause of the blockages that led to about 60% of the dry weather bypasses in our service area. The Greater New Haven Water Pollution Control Authority (GNHWPCA) has recognized this issue as well and has taken proactive steps to address FOG related bypasses through a three pronged program: (1) control FOG from entering the system through our Restaurant FOG program; (2) targeted maintenance of identified problem areas or "hot spots" and (3) public outreach to address residential FOG reduction.

Restaurant FOG Program

GNHWPCA has a model FOG (Fats, Oils and Grease) program that has been used by CTDEEP in establishing its General permit for Food Preparation Establishments. We have frequently been asked to present this program. (See attached FOG Presentation.)

In 1995 the City of New Haven added FOG limitations to its sewer ordinance through which a surcharge was assessed when FOG discharges were over 100 mg/l. In 2005, in part informed by the New Haven program, CTDEEP established the General Permit for Food Preparation Establishments (FPE's) which required FOG discharges to be under 100 mg/L. Since 2005, the then created GNHWPCA, has had to bring the other communities (Hamden, East Haven and Woodbridge) up to the level of inspections and compliance to the standards that had been achieved in New Haven. We established a schedule to get all FPE's in our service area to be compliant with the General Permit. Inspection and sampling of dischargers of FOG are conducted by the GNHWPCA's Industrial Pretreatment Program (IPP) Inspectors. Under this schedule, the IPP inspectors check all FPEs at least once a year. There are roughly 750 FPEs in the GNH area and 1,885 inspections of FPEs were made in 2012. This equates to about 2.5 inspections per Food Preparation Establishment per year. The below graph illustrates the success of these efforts, showing a compliance rate of 95%.



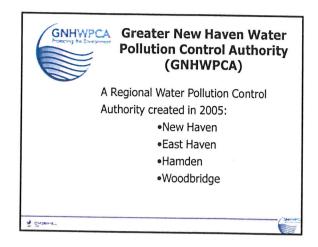
Targeted Hot Spot Approach

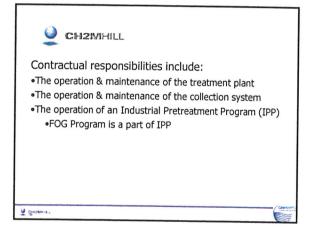
GNHWPCA has developed an approach to FOG problem areas that in short maps those areas and sets a schedule of maintenance activities. As noted above, upon regionalization we recognized FOG as a root cause of bypasses and determined to develop a regionwide approach to addressing these issues. Please see documents previously submitted in April 2012: GNH0083 Woodbridge Hot Spots, GNH0084 East Haven Hot Spots, GNH0085 Hamden Hot Spots and GNH0086 New Haven Hot Spots. Our Capacity, Management, Operations and Maintenance (CMOM) and Preventative Maintenance Programs focus inspection and cleaning efforts in these hot spot areas.

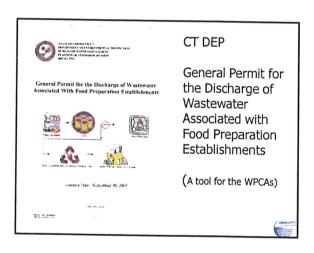
Residential FOG Issues

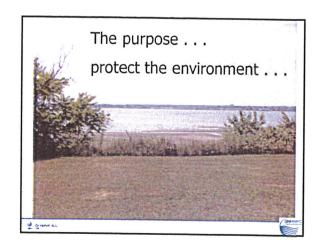
With the commercial FOG producers being addressed through the program detailed above, the remaining FOG issues are a result of residential discharges. The GNHWPCA has issued FOG articles in our newsletter which is included with every bill. The GNHWPCA website also has information on the proper disposal of grease from households. GNHWPCA intends to periodically update and reissue this information. Please see attached newsletters and screenshots from our website.



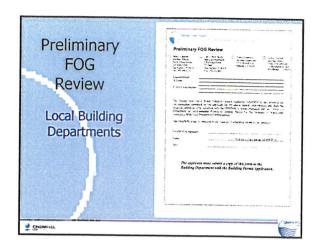


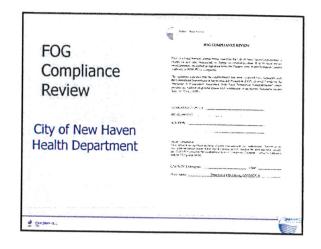


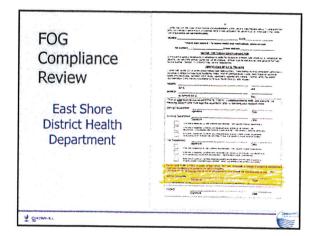


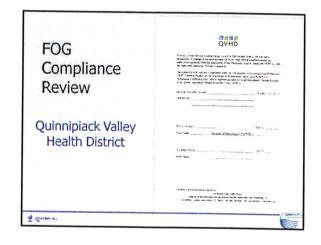












"Authorized agent"
means the water pollution control authority (WPCA) or its designee.

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"Fats, oils and grease" or "FOG"

means any fats, oils and grease
generated from the food
preparation process.

"Food preparation establishment"

means a Class III and IV food service establishment as defined by Section 19-13-B42 of the State of Connecticut Public Health Code . . .

CH2MH-E.

Class III & Class IV

are food service establishments having on the premises exposed . . . foods that are prepared by hot processes and by the public . . .

<u>Class III</u>: consumed within4 hours of preparation <u>Class IV</u>: held for more than 4 hours prior to consumption

. . or any other facility discharging fats, oil, and grease above the effluent limits . . . of this general permit such as but not limited to . . .

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- Restaurants,Hotel kitchens,
- Hospital kitchens,
- School kitchens,
- Bars,
- · Factory cafeterias,
- Retail bakeries and
- Clubs.

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(d) Effective Date and Expiration Date of This General Permit

(09/30/05)

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Conditions of This General Permit(a) Compliance Schedule

(1) A facility, which begins discharging <u>after</u> the effective date of this general permit,

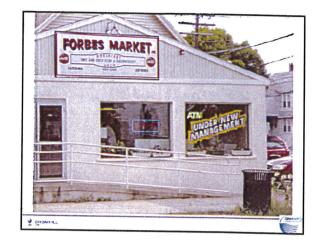
<u>shall comply</u> with all conditions of this general permit <u>before</u> initiating such discharge.

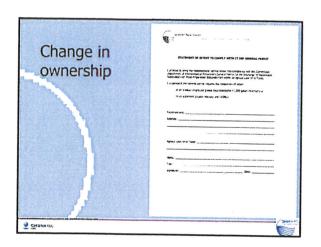
) orderer

(2) A facility, which began discharging on or before the effective date of this general permit, . . . shall comply with all conditions of this general permit no <u>later than July 1, 2011</u> with the following exceptions:

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(A) A <u>change in ownership</u> of the facility shall require compliance with all conditions of this general permit <u>within 60 days</u> of the change in ownership.





(B) A <u>renovation</u> of the facility shall require <u>compliance with all</u> <u>conditions</u> of this general permit as part of the renovation. (Exceeding \$20,000 in one year).

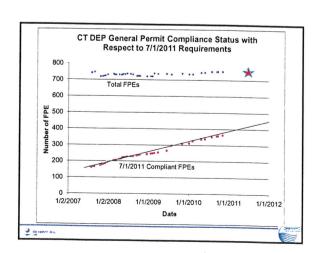
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Problem Area

(C) The authorized agent may, as necessary, designate any area or areas of its sewer system as a problem area related to fats, oils and grease.

Upon notification by the authorized agent, any facility within the problem area designation <u>shall</u> <u>comply</u> with all conditions of this general permit within <u>a reasonable time schedule</u> established by the authorized agent.





(b) Treatment Requirements

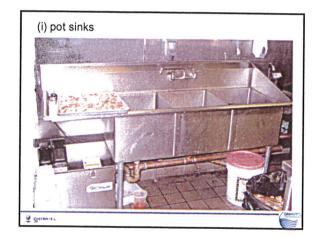
- (1) Outdoor In-Ground Grease Trap/Interceptor
- (2) Automatic Grease Recovery Unit (AGRU)
- (3) Other Approved Unit
- (4) Diminimus Discharges

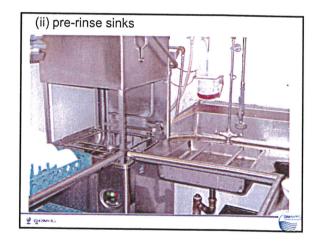
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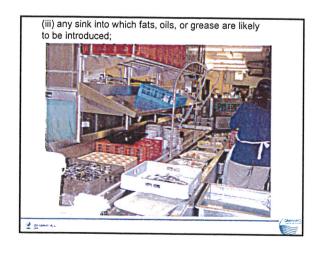
Outdoor In-Ground Grease Trap/Interceptor
A) The grease trap/interceptor shall be
installed on a separate building sewer line
servicing kitchen flows and shall be connected
to those fixtures or drains which would allow
fats, oils, and grease to be discharged.

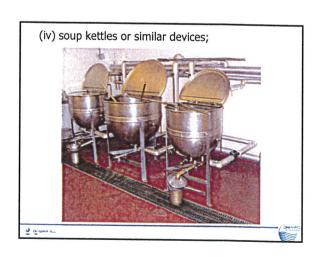
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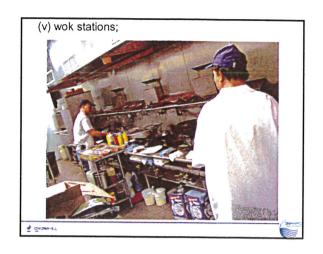




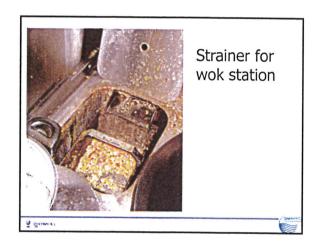


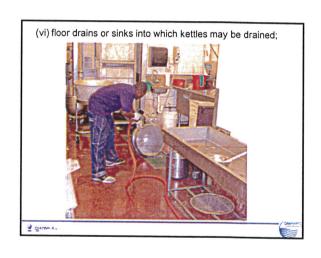






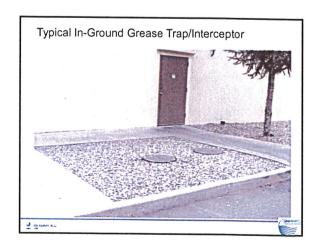


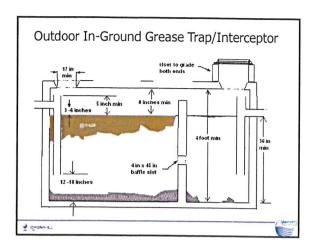


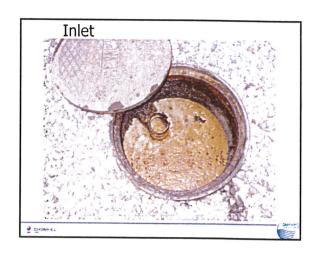


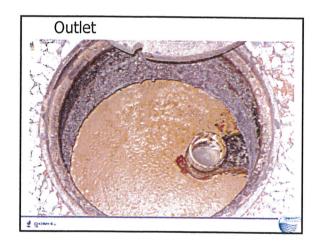
- (vii) automatic hood wash units;(viii) dishwashers without pre-rinse sinks; and
- (ix) any other fixtures or drains that are likely to allow fats, oils and grease to be discharged.

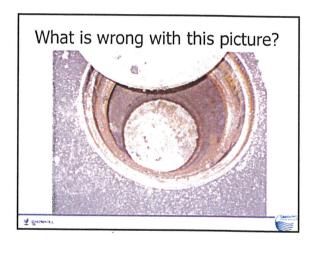
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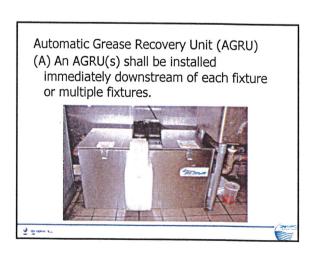


Outdoor In-Ground Grease Trap/Interceptor

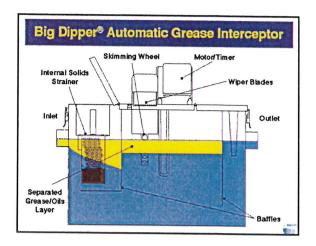
CT DEP "patron-based" Sizing Criteria

(i) The volume equivalent to the maximum daily flow over a twenty-four (24) hour period . . . , or

(ii) 1000 gallons, whichever is greater.







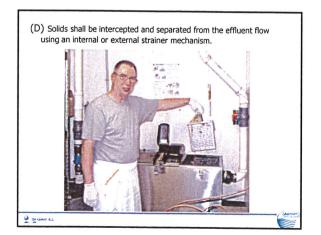
Automatic Grease Recovery Unit (AGRU)

(B) The AGRU shall be sized to properly pre-treat the measured or calculated flows for all connected fixtures or drains. (See CT DEP Sizing Criteria).

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Automatic Grease Recovery Unit (AGRU)

(C) The AGRU shall be constructed of corrosion-resistant material such as SS or plastic.



Automatic Grease Recovery Unit (AGRU)

(E) The unit shall operate using a skimming device, automatic draw-off, or other mechanical means to automatically remove separated fats and oils.

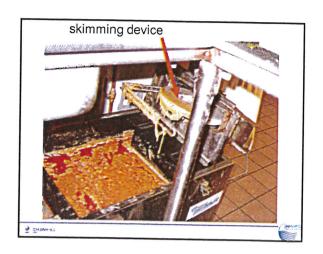
This automatic skimming device shall . . . connected electrically and controlled using a timer or level control.

The operation of the automatic skimming device shall be field adjustable.

The AGRU shall operate no less than once per day.

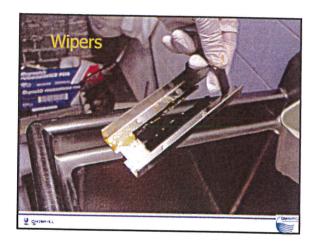
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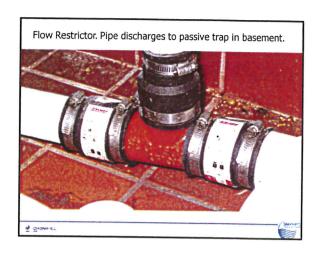
Automatic Grease Recovery Unit (AGRU)

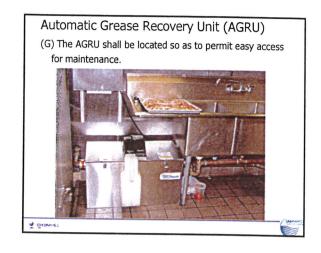
(F) The AGRU shall be fitted with an internal or external flow control device to prevent the exceedence of the manufacturer's recommended design flow.

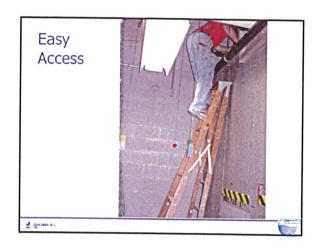
(Some kind of flow restrictor)











Automatic Grease Recovery Unit (AGRU)

(H) No fixture or drain other than those listed . . . shall be connected to the AGRU unless approved by the authorized agent.

(I) All AGRUs shall be designed and installed in accordance with the manufacturer's specifications.

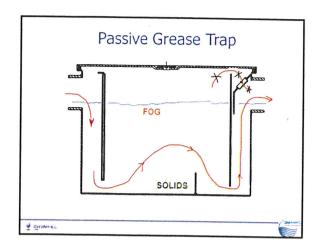
(3) Other Approved Unit

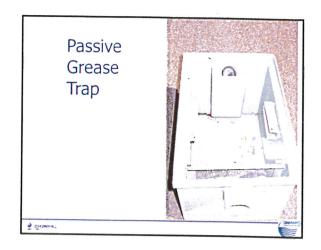
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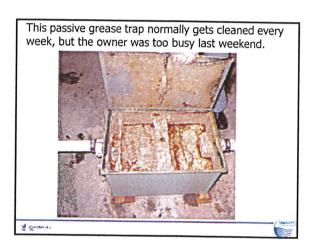
If the permittee requests the use of a unit other than an outdoor in-ground grease trap/interceptor or an AGRU, the proposed permittee must demonstrate that the other unit can reliably meet the effluent limitations established in . . . this general permit. Only after receiving written approval by the authorized agent will the permittee be authorized to install the unit.

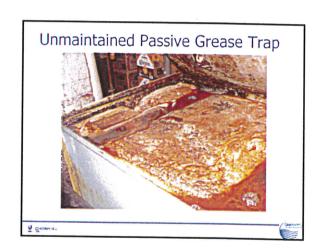
₩ 20 (2000 a.L.

This is not an "Other Approved Unit"









(4) Diminimus Discharges

At the request of the permittee, the authorized agent **may** grant a waiver of the treatment requirements of . . . this general permit if, in the judgment of the authorized agent, there is limited potential for FOG in the discharge when considering, including but not limited to,

- the frequency of operation,
- the volume of flow and
- the potential for fats, oils and grease based upon the menu.

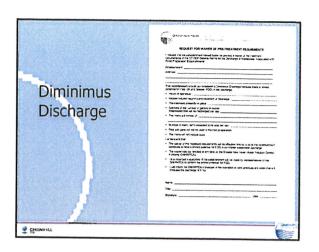
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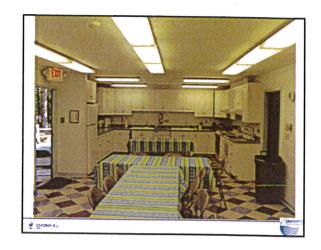
(4) Diminimus Discharges

Suggestions:

- Revocable
- Non-transferable
- Limited to 3 year
- Passive G.S. requirement

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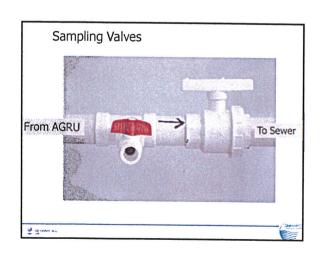






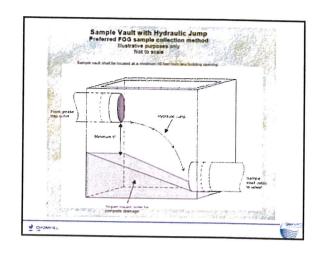
(c) Effluent Limitations pH: - between five (5.0) and ten (10.0) standard units (GNHWPCA - 5.5 to 9.5) Concentration of fats, oils, and grease in wastewater: - less than 100 milligrams per liter. Biological Oxygen Demand (BOD) - less than 250 mg/l Total Suspended Solids (TSS)

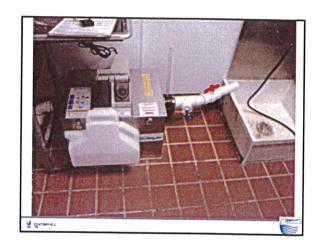
- Less than 250 mg/l

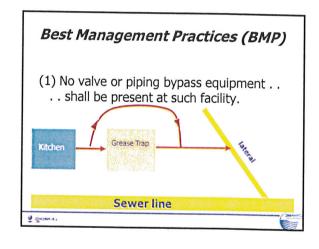


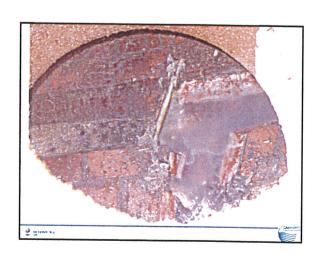




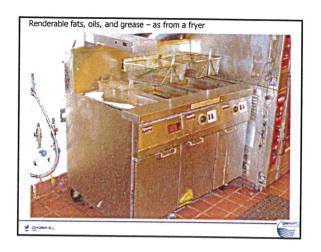










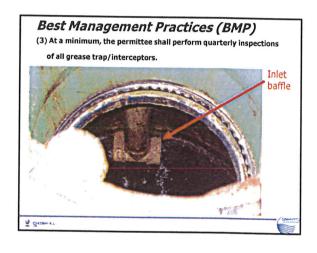


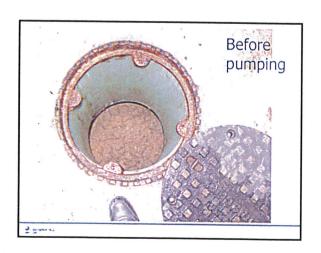
No renderable fats, oils, and grease shall be discharged into:

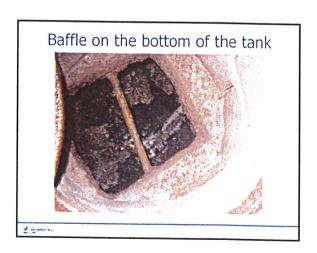
- grease trap/interceptors or
- · AGRUs,
- sanitary sewers,
- dumpsters or
- storm sewers.

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Best Management Practices (BMP)For cleaning or servicing of grease

For cleaning or servicing of grease trap/interceptors, ... the permittee shall hire a grease trap/interceptor cleaner.



BMP

- 4) An outdoor in-ground grease trap/interceptor shall be completely emptied whenever:
- 25% occupied by fats, oils, grease and settled solids or
- a minimum of once every three (3) months

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BMP

4) (continued)

The permittee may request approval for a less frequent cleaning interval

The permittee shall maintain a written \log on-site of grease trap/interceptor cleaning and maintenance .

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(e) Reporting and Record Keeping Requirements

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BMP

(6) All AGRUs shall be maintained in accordance with the manufacturer's recommendations.

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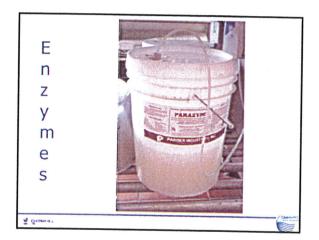
For disposal outside of Connecticut, the contents of all grease trap/interceptors, AGRUs and other approved units shall be disposed of in an environmentally accepted manner.

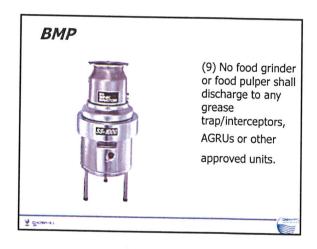
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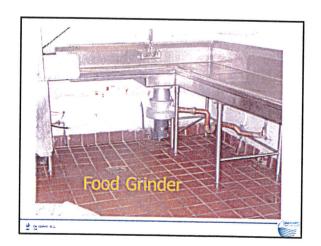
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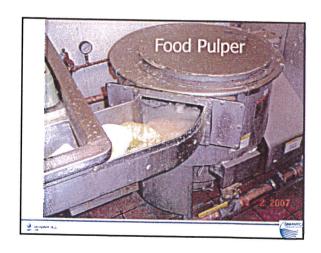
(8) The permittee may use hot water, steam, chemicals, or biological additives in the normal course of facility maintenance, but may not intentionally use hot water, steam, physical means, chemicals, or biological additives that will cause the release of fats, oils, and grease from the grease trap/interceptor.

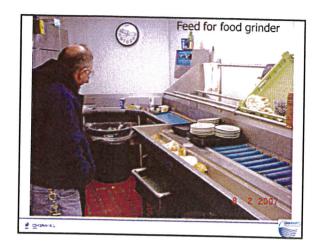
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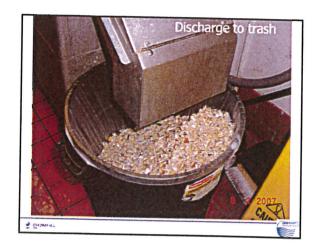












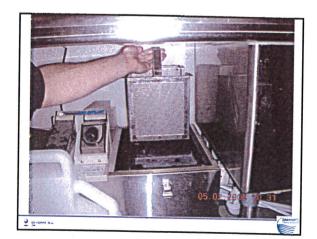


BMP

(10) All wastewater flows connected to the grease trap/interceptors shall be screened to prevent solids from entering the treatment units.

Screened solids shall be disposed of in accordance with applicable solid waste regulations.





Authority Committed to Green Energy

One of the GNHWPCA's core values is to protect the environment. On a daily basis, an average of 30 million gallons of sewage is treated before being discharged into New Haven Harbor. The treating of sewage, however, is energy intensive as it relies on the speeding up of natural biological processes.

We have made a commitment to strive for green energy. Currently, we have a 0.2 MW fuel cell and a 0.75 MW waste heat turbine which offsets a portion of the wastewater treatment plant's 2.0 MW power demand. To further our goal of attaining a sustainable future, we are exploring the feasibility of installing a 1.0 MW wind turbine at the wastewater plant to harness the energy of the wind that could further reduce our dependency on power from United Illuminating. The Authority is undergoing the first step in the process by performing a wind study with a state of the art Sonic Detection and Ranging (SODAR) wind measuring instrument. This SODAR unit provides monitoring of the wind 24/7 to altitudes of 500 feet without the need for a temporary meteorological tower. The information provided by the SODAR unit will help the Authority determine feasibility. At the same time, we are in the process of working with the Federal Aviation Ad-



ministration to permit such a structure if the wind study results proves to be economically viable.

Through this progressive vision, we hope to reduce our carbon footprint, save operating costs and further protect the environment.

The SODAR (pictured above) is a meteorological instrument also known as a wind profiler which measures the scattering of sound waves by atmospheric turbulence. SODAR systems use sound waves to measure wind speed at various heights above the ground.

FOG (Fats, Oils, and Grease) Alert! Grease is bad for the sewers. Keep out!

When "Fats, Oils and Grease" (FOG) are poured or washed down the sink, they travel down the drain and stick to the wall of the sewer pipe. Over time, the grease accumulates and can cause a blockage that impedes the flow of sewage down the pipe. Blockages are problematic as they create back-ups into people's homes and raw sewage overflows onto public streets. This exposes people to public health hazards that can easily be avoided.

Do not pour grease down the drain. Let's work together so we can prevent a public health hazard. Put FOG where it belongs by following these easy steps:

Step 1 Cooking Oil Disposal

When finished cooking, let the oil cool and pour it into a container, such as a coffee can. Then simply throw the container in the garbage can for disposal.

Step 2 Greasy Pans

Prior to washing greasy pots and dishes, wipe clean with a disposable towel.

Step 3 Fat Trimmings

Do not put fat trimmings down the garbage disposal, rather put them in the trash

2011 Meeting Schedule

The GNHWPCA will hold its' regular monthly meetings on the second Tuesday of the month, at 6:00 PM, at the Administrative Offices, 260 East Street, New Haven, CT. The meeting dates are:

January 11, 2011	May 10, 2011	September 13, 2011
February 8, 2011	June 14, 2011	October 11, 2011
March 8, 2011	July 12, 2011	November 8, 2011
April 12, 2011	August 9, 2011	December 13, 2011

ENTER OUR DRAWING TO WIN A FREE RAIN BARREL!

Fill out this form and return to: GNHWPCA, ATTN: RAIN BARREL RAFFLE 260 East Street, New Haven, CT 06511

Please Print

NAME

ADDRESS

PHONE (please include area code)

PLEASE DO NOT RETURN THIS TICKET WITH YOUR BILL

Our RAIN BARREL RAFFLE is made possible by a joint effort of GNHWPCA and the Sound School of New Haven. We are proud to announce that this is our second year of working along with its staff and students.

EARTH DAY 2011



We look forward to seeing you on

EARTH DAY

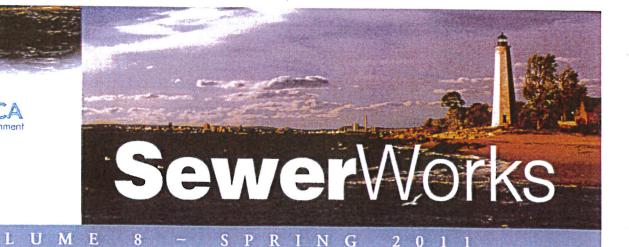
at

HAMDEN MIDDLE SCHOOL



in APRIL 2011





From the Chairman

REGIONALIZATION-FIVE YEARS OF SUCCESS



As the Greater New Haven Water Pollution Control Authority enters its sixth year of providing service to the towns of East Haven, Hamden, New Haven and Woodbridge I would like to review our achievements to date. The GNHWPCA was created in 2005 by concurrent ordinances and asset purchase in the regional communities.

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Let us review the goals of regionalization of

the wastewater collection and treatment systems in the four towns. One of the goals was to address the challenges related to historically under-funded sewer systems, aging infrastructure and increased regulatory requirements. Not only is this a regional issue but also a national concern. The GNHWPCA has been investing in our infrastructure. Since our inception over \$20 Million has been spent on the collection system by repairing, lining and replacing underground pipes and manholes, the Old Chauncey Pump Station in Hamden has received a much needed upgrade and the Authority has replaced two 42 inch force mains, which run under the harbor, in partnership with the CTDOT Pearl Harbor Memorial Bridge project. The Authority has addressed increasing regulatory requirements with the creation of a Facility Plan which will address increased nitrogen removal and decreased Combined Sewer Overflows both of which have a direct impact on the receiving waters of our area.

With a regional facility the economies of scale occur to enhance service delivery through integration and upgrading of systems as can be seen with the installation of a radio system to communicate to the pump stations in the region. Economies of scale were realized by the Authority, as compared to the individual communities, when only one base station was needed and previously unachiev-

ble communications were able to connect by using repeater locations across the region. The GNHWPCA is now able to prioritize collection system work across the region to obtain the best value for work done in removing inflow and infiltration. The GNHWPCA has also integrated its maintenance systems (Computerized

Maintenance Management System) for equipment and collections infrastructure and its mapping systems (Graphical Information System) to the whole region. Previously these systems were not implemented due to the cost and complexity for the smaller systems. Implementation of a Customer Information System is another benefit to the region as it provides a service for all the regional communities that was not there before and provides a cost savings as compared to the way it was being done in the past.

The GNHWPCA also removed the liabilities associated with operating a wastewater collection system from the regional communities, provided payment for the assets and continues annual payments in lieu of taxes for the assets the GNHWPCA owns.

The creation of the regional entity required that \$1 Million be set aside for the establishment of an environmental fund to support environmental projects. In addition to achieving the goals set out at the formation of the regional authority, the GNHWPCA has created a Strategic Plan to guide the Authority in its mission and vision.

Regionalization has also provided for a more equitable cost structure across the entire region. This unified rate structure for everyone that uses the system provides for equitable distribution of the

costs. During the creation of the regional authority the rates were projected for five years to incorporate all costs needed for an environmental authority to accomplish its mission. I am happy to report that we were two cents below the recommended rate for fiscal year 2009-2010. We are working to achieve the best value for our customers. As can be seen by the table below the GNHWPCA is one of the best values in the region.

SEWER RATE COMPARISON (per ccf)

TOWN	RATE
GNHWPCA	\$2.84
Waterbury	\$3.39
Manchester	\$3.46
Meriden	\$3.50
Stamford	\$3.56
Norwich	\$3.80
Bridgeport	\$4.27

nttp://www.gnhw

Greater New Haven Water Pollution Control Authority

Serving the Connecticut communities of New Haven, Hamden, East Haven and Woodbridge

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Fat, Oil, and Grease Removal

FOG Alert! Grease is bad for the sewers. Keep out!

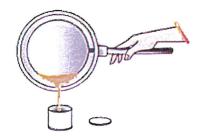
When "Fats, Oils and Grease" (FOG) are poured or washed down the sink, they travel down the drain and stick to the wall of the sewer pipe. Over time, the grease accumulates and can cause a blockage that impedes the flow of sewage down the pipe. Blockages are problematic as they create back-ups into people's homes and raw sewage overflows onto public streets. This exposes people to public health hazards that can easily be avoided.

How should you dispose of FOG?

Do not pour grease down the drain. Let's put FOG where it belongs by following these easy steps:

Step 1 - Cooking Oil Disposal

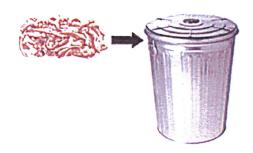
When finished cooking, let the oil cool and pour it into a container, such as a coffee can. Then simply throw the container in the garbage can for disposal.





Prior to washing greasy pots and dishes, wipe clean with a disposable towel.

Step 3 – Fat Trimmings Do not put fat trimmings down the garbage disposal, rather put them in the trash.



By following these easy steps, sewers can be kept clean and blockages can be avoided. Let's work together so we can prevent a public health hazard.

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Food Preparation Establishments

GNHWPCA Grease Trap/Interceptor Installation Requirements

Food Preparation Establishments (FPE's) that discharge wastewater to the Greater New Haven Water Pollution Control Authority (GNHWPCA) system must comply with the State of Connecticut's Department of Environmental Protection (DEP) "General Permit for the Discharge of Wastewater Associated with Food Preparation Establishments" that became effective September 30, 2005.

The CT general permit seeks to reduce Fats, Oils, and Grease from entering the public wastewater system from Class III or IV food service establishments through the use of:

- Outdoor In-Ground Grease Trap/Interceptor (1,000 gallon minimum), or
- Automatic Grease Recovery Unit (AGRU)

There are other requirements for Class III and IV FPE's that are defined in the State of Connecticut General Permit.

All FPE's were required to comply with this permit by July 1, 2011.

The following are requirements of the GNHWPCA:

1. Prior to installation:

In-ground Grease Trap/Interceptor:

Engineering drawings (site plans and/or utility plans showing the connection to the sewer and the location of the grease trap/interceptor) prepared and signed by the FPE's CT licensed professional engineer must be submitted to the GNHWPCA Engineering Department for review and approval. The FPE is also required to submit sizing calculations demonstrating that the unit chosen is adequate for the FPE's use.

A GNHWPCA permit will be required for the installation of an in-ground grease trap/interceptor.



The GNHWPC[^] requires the installation of a backwater valve and a cleanor downstream . I the grease/trap interceptor. Grease trap/interceptor shall installed on 8" of bedding material, Item 305, per GNHWPCA Standards.

Automatic Grease Recovery Unit (AGRU):

The FPE is required to submit sizing calculations for review by the GNHWPCA's Industrial Pretreatment Department (IPP) Coordinator. The sizing calculations must be consistent with the Fixture-Based Method found in the Connecticut Department of Environmental Protection's Sizing Criteria, and may be prepared by the AGRU's distributor. The IPP Coordinator may require additional documentation such as a floor plan.

The installation must include a sampling port located after the AGRU so that a GNHWPCA IPP inspector can take representative samples of the wastewater flow from the AGRU. It is recommended that arrangements be made for the plumber who will install the AGRU to meet with one of the GNHWPCA IPP Inspectors to discuss the requirements before the work starts.

2. Post-installation inspection:

Once the grease trap/interceptor or AGRU has been installed, a GNHWPCA IPP inspector will visit the establishment to verify that the equipment installed matches what was described in the submitted documentation. The inspector may also review the operation of the AGRU with those responsible for maintaining it.

3. Acceptance:

Once inspected by the GNHWPCA, and no discrepancies in the installation are found, the GNHWPCA IPP Coordinator will recommend to the GNHWPCA Director of Operations that the installation be accepted as compliant with regulatory requirements. Copies of the signed verification form will be provided to the FPE and the local health department.

Local health departments will not approve a FPE's Food Service Application until they have received verification from the GNHWPCA that the FPE is in compliance with the general permit.

Note:

- a. The GNHWPCA does not size or approve grease trap/interceptors or AGRUs. After reviewing the submitted documentation, the GNHWPCA only acknowledges that the equipment has been appropriately sized by the owner or its representative.
- b. The GNHWPCA does not give advice on or give approval for plumbing.
- c. Building Inspectors, Plumbing Inspectors and Health Inspectors do not approve grease trap/interceptors or AGRUs.

Links for me a information

GNHWPCA Grease Trap/Interceptor Requirements

GNHWPCA Sewer Ordinance

CT DEP General Permit for the Discharge of Wastewater Associated with Food Preparation Establishments

CT DEP Food Preparation Establishment's Guide To The General Permit For The Discharge of Wastewater Associated with Food Preparation Establishments and the CT DEP Food Preparation Establishment's Guide To Disposal of Animal Fat and Cooking Oil

GNHWPCA Contacts

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